COMPETITIVE TELECOMMUNICATIONS ASSOCIATION

ADVANCING GLOBAL COMMUNICATIONS THROUGH COMPETITION

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EX PARTE OR LATE FILED

CompTel

September 20, 2001

Via Hand Delivery

ORIGINAL

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Presentation in CC Docket No. 96-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that on September 19, 2001, its representatives, and representatives of CompTel members AT&T, Cable & Wireless, Focal Comunications, and WorldCom met with Commission staff to discuss the need for the FCC to take comprehensive action to improve the quality of ILEC-provisioned interstate special access circuits. CompTel met with Kyle Dixon, Legal Advisor to Chairman Powell.

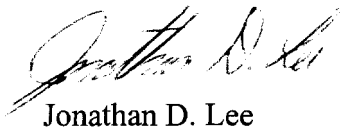
In this meeting, CompTel explained that it had established a Special Access Task Force in June of this year in response to growing complaints by competitive carriers regarding the progressively declining service quality of interstate special access. This group is comprised of some of the largest purchasers of ILEC-provisioned special access in the telecommunications industry, all of whom are critically dependent on ILEC-provisioned special access in order to provide telecommunications services to their customers.[1] For this reason, CompTel asked the Commission to adopt comprehensive performance measures, standards, and to prescribe certain consequences for the failure to meet these standards. The Commission, CompTel explained, must ensure that interstate special access service is available to other carriers, especially competitors of the ILECs, at rates, terms, and conditions, which are just, reasonable, and nondiscriminatory. CompTel also explained the many ways in which competitive carriers provide local, interexchange, and data service to their customers using special access, and that for many, if not most, of the service configurations in which a special access circuit is

[1] The CompTel carrier members in the Special Access Task Force are: AT&T, Broadwing, Cable & Wireless, El Paso Global Networks, Enron, Focal Communications, Global Crossing, Level 3, and WorldCom.

required, the only facilities available are those of the ILEC. CompTel used the attached diagrams in this discussion.

Representing AT&T at this meeting was Robert Quinn. Representing Cable and Wireless, were Audrey Wright and Steve Augustino. Representing Focal Communications was Pamela Arluk. Representing WorldCom were Lisa Smith and Richard Metzger. Representing CompTel was the undersigned attorney.

Sincerely,

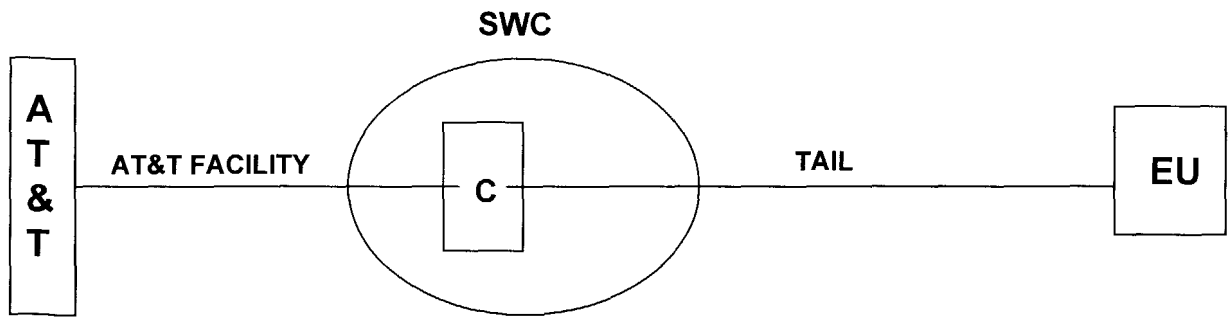


Jonathan D. Lee
Vice President,
Regulatory Affairs

UNE/DS1 SCENARIOS

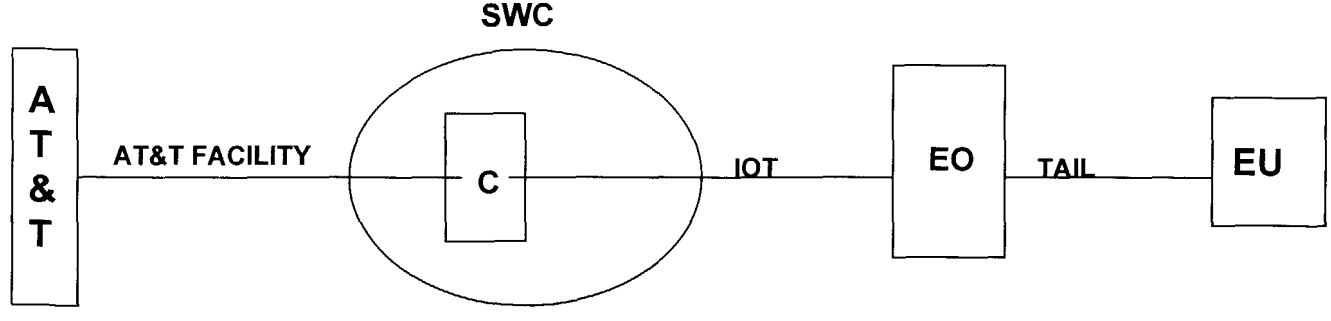
CINDY RHODES
LOCAL CONNECTIVITY COSTS

CONFIGURATION #1
Collocation with tail to end user



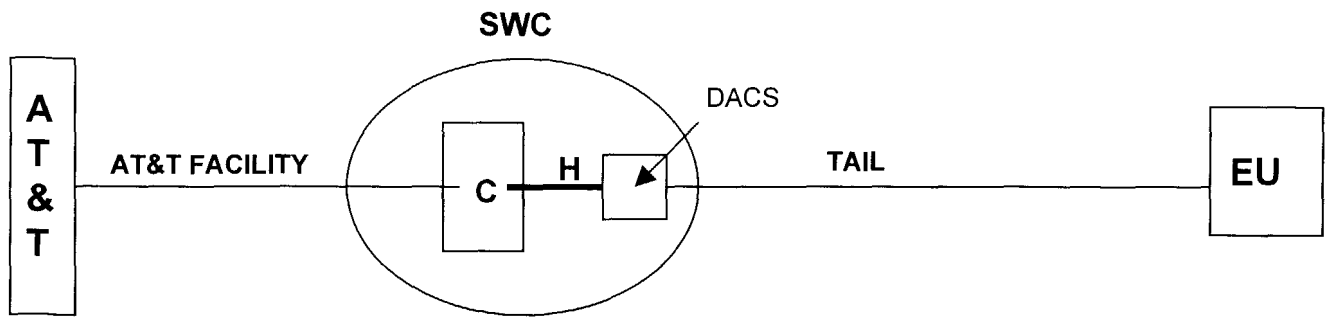
SWC = ILEC SERVING WIRE CENTER
C = COLLOCATION CAGE
EU = END USER

CONFIGURATION #2
Collocation with transport and tail to end user



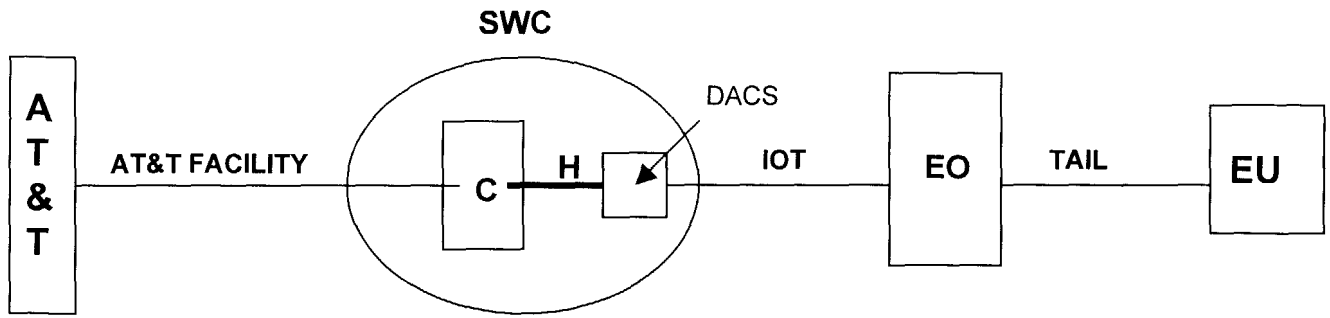
SWC = ILEC SERVING WIRE CENTER
C = COLLOCATION CAGE
EU = END USER
EO = END OFFICE
IOT = INTEROFFICE TRANSPORT

CONFIGURATION #3
Collocation with hub and tail to end user



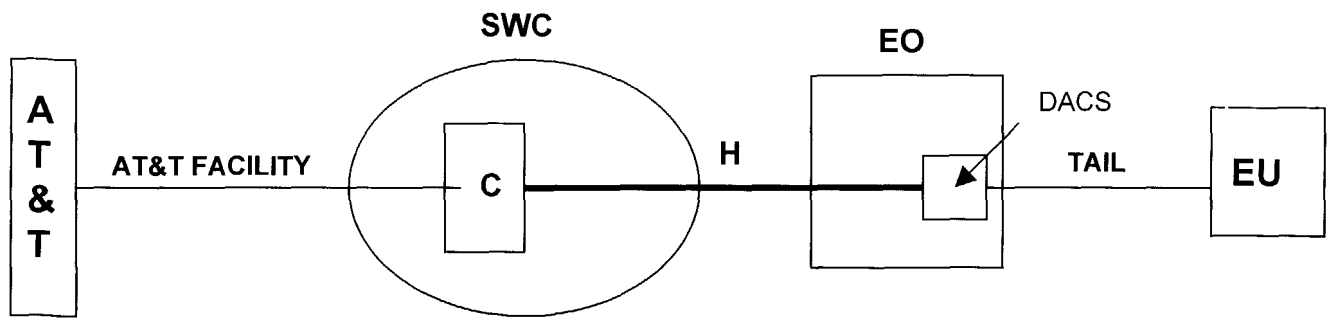
SWC = ILEC SERVING WIRE CENTER
C = COLLOCATION CAGE
EU = END USER
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX

CONFIGURATION #4
Collocation with hub, transport and tail to end user



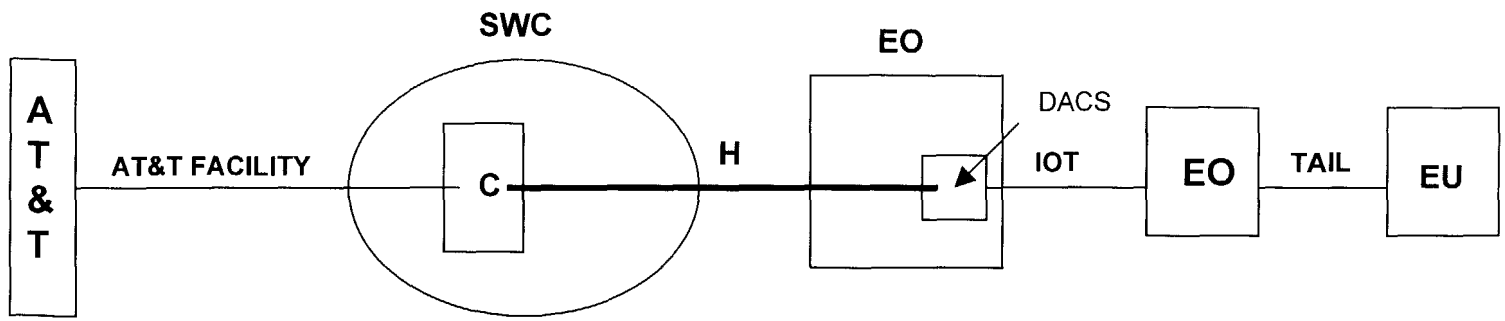
SWC = ILEC SERVING WIRE CENTER
C = COLLOCATION CAGE
EU = END USER
EO = END OFFICE
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX
IOT = INTEROFFICE TRANSPORT

CONFIGURATION #5
Collocation with extended hub and tail to end user



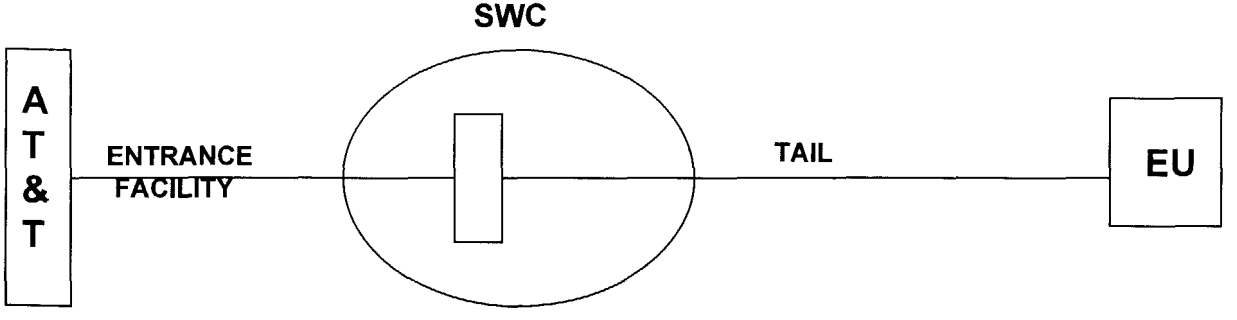
SWC = ILEC SERVING WIRE CENTER
C = COLLOCATION CAGE
EU = END USER
EO = END OFFICE
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX

CONFIGURATION #6
Collocation with extended hub, transport and tail to end user



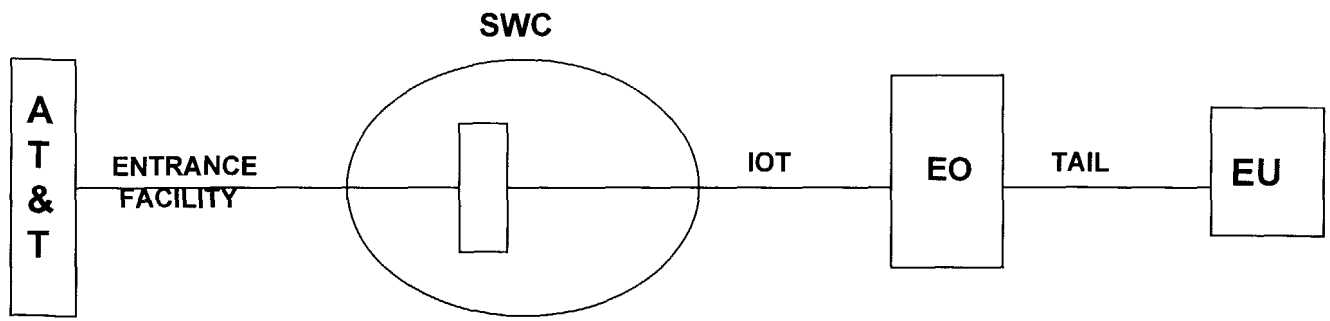
SWC = ILEC SERVING WIRE CENTER
C = COLLOCATION CAGE
EU = END USER
EO = END OFFICE
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX
IOT = INTEROFFICE TRANSPORT

CONFIGURATION #7
Entrance facility with tail to end user



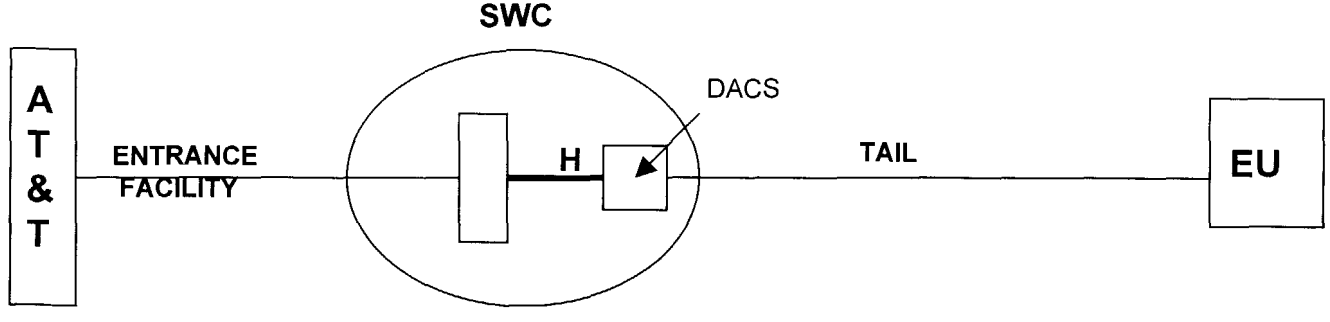
SWC = ILEC SERVING WIRE CENTER
EU = END USER

CONFIGURATION #8
Entrance facility with transport and tail to end user



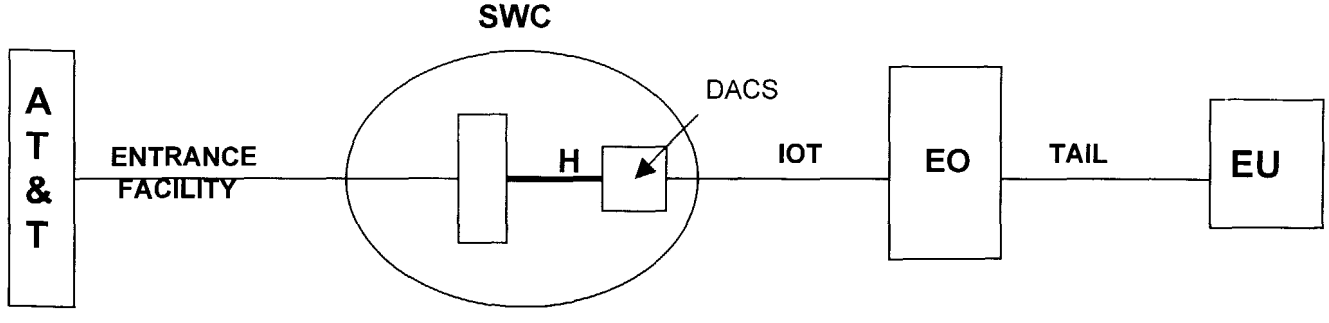
SWC = ILEC SERVING WIRE CENTER
EU = END USER
EO = END OFFICE
IOT = INTEROFFICE TRANSPORT

CONFIGURATION #9
Entrance facility with hub and tail to end user



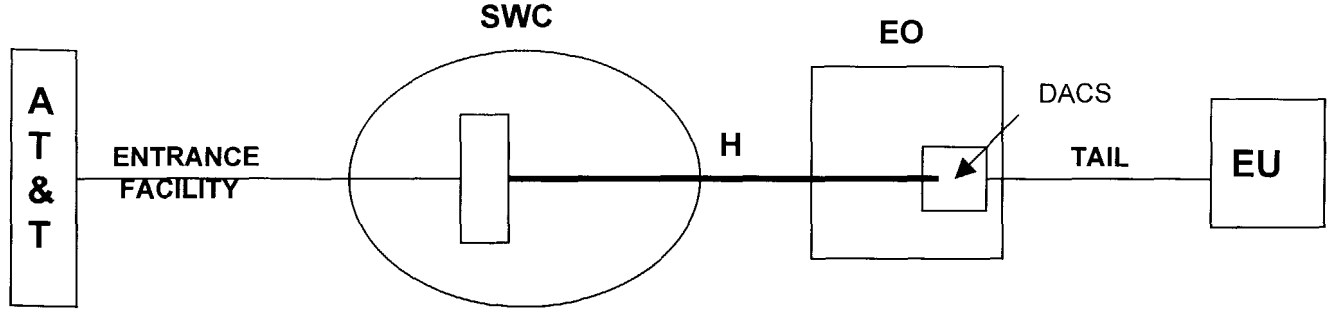
SWC = ILEC SERVING WIRE CENTER
EU = END USER
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX

CONFIGURATION #10
Entrance facility with hub, transport and tail to end user



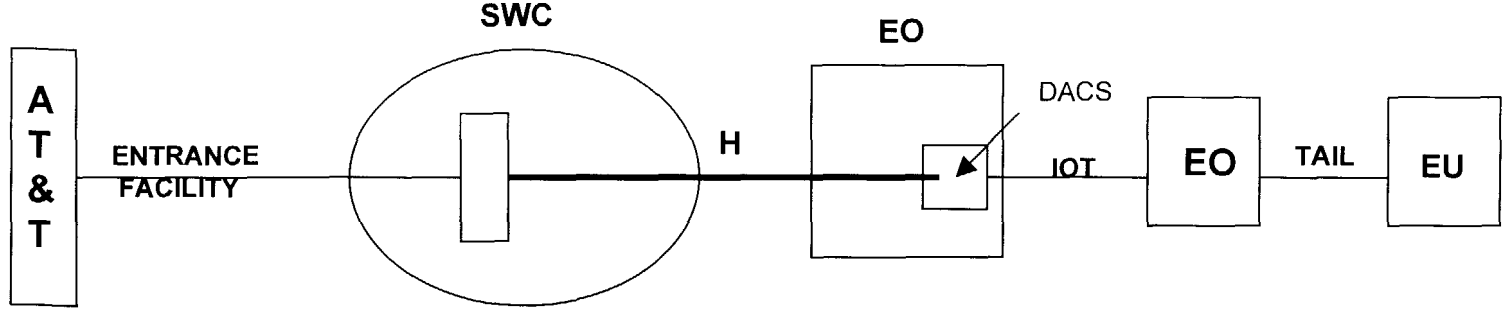
SWC = ILEC SERVING WIRE CENTER
EU = END USER
EO = END OFFICE
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX
IOT = INTEROFFICE TRANSPORT

CONFIGURATION #11
Entrance facility with extended hub and tail to end user



SWC = ILEC SERVING WIRE CENTER
EU = END USER
EO = END OFFICE
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX

CONFIGURATION #12
Entrance facility with extended hub, transport and tail to end user



SWC = ILEC SERVING WIRE CENTER
EU = END USER
EO = END OFFICE
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX
IOT = INTEROFFICE TRANSPORT